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April 10, 2023

VIA ECF

The Honorable Barbara Moses
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Charlie Javice*, 23-mj-2638

Dear Judge Moses:

On behalf of our client, Charlie Javice, we respectfully submit this letter to request a limited modification to Ms. Javice's bail conditions. We have communicated these modifications to the Government, and it has no objections.

A. Current Bail Conditions

Ms. Javice was released on a bond on April 4, 2023. (ECF No. 8.) Under Ms. Javice's current bail conditions, she is not permitted to have "any contact with CC-1, Data Scientist-1, or current employees of JPMorgan Chase, except in the presence of counsel."¹ Ms. Javice is also not permitted to have any contact with former employees, investors, and/or board members of FRANK substantively related to this case, except in the presence of counsel. The latter condition does not apply to Ms. Javice's mother or her mother's boyfriend.

B. Requested Modifications to Bail Conditions

We respectfully request to modify the no-contact condition with two exceptions. Ms. Javice has two limited but important relationships with JPMorgan Chase that do not involve or relate in any way to the Government's allegations. First, she has a mortgage with JPMorgan Chase,

¹ The Government uses the names "CC-1" and "Scientist-1" (referring to Data Scientist-1) in its complaint against Ms. Javice. (ECF No. 1 ¶¶ 13, 24.)

and she may be contacted by JPMorgan Chase representatives or she may otherwise need to communicate with JPMorgan Chase, solely in her capacity as a mortgager and the institution's capacity as a mortgagee. Second, she has one remaining investment account at JPMorgan Chase, for which she may need to coordinate with the responsible bank employees to manage the account.

Accordingly, unopposed by the Government, we respectfully request that Ms. Javice's bail be modified as follows:

Ms. Javice is not to have any contact with CC-1, Data Scientist-1, or current employees of JPMorgan Chase, except in the presence of counsel; notwithstanding the foregoing, Ms. Javice may communicate with JPMC or Chase employees regarding her Chase home mortgage loan. Ms. Javice may also contact the JPMC / Chase Private Bank Support Line as needed at +1 (800) 576-0379 related to her Chase mortgage and an investment account at JPM. Ms. Javice may also contact four particular JPMC employees and a particular customer service email account at JPMC (that have been identified to the Government) as required related to her investment account at JPMC. Ms. Javice is not to have any communication concerning this case with former employees, investors, and/or board members of FRANK, except in the presence of counsel. This condition does not apply to the Ms. Javice's mother or the mother's boyfriend.

With these exceptions, the no-contact condition would be tailored more appropriately and would not unduly prevent Ms. Javice from managing her affairs as necessary.

Respectfully submitted,

/s/ Maaren Shah

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cc: All counsel of record (via ECF)